

December 12, 2024

VIA E-FILING

The Honorable Rukhsanah L. Singh, U.S.M.J. United States District Court – District of New Jersey 402 East State Street, Courtroom 7W Trenton, New Jersey 08608

> Re: Marganski v. Mogavero, et al Docket 24-cv-01289-ZNQ-RLS

Dear Magistrate Judge Singh:

My office represents the plaintiff in the above-entitled matter. I am writing to respectfully inquire if the Court would like the plaintiff to submit a response to the defendant's sur-reply as it introduces the concept of "reopening" discovery that: a) was not proffered in the original motion papers; and b) is easily distinguished from the appropriate case law, the FRCP and this Court's Individual Rules in the case at bar.

I am available at the Court's convenience if there are any questions or concerns.

Respectfully,

s! Joseph D. Monaco, III

Joseph D. Monaco, Esq.

Cc: All Parties via ECF